| UNITED STATES DISTRICT COURT  |   |
|-------------------------------|---|
| SOUTHERN DISTRICT OF NEW YORK |   |
| X                             | _ |

THELMA FELIPE,

NOTICE OF MOTION FOR REMAND

Plaintiff, Docket.: 08 CV 4317

-against-

TARGET CORPORATION and KINGSBRIDGE ASSOCIATES, LLC.,

Judges Assigned: Holwell, J. Pitman, M.

Defendants. -----X

Upon the affirmation of Michael J. Asta, sworn to on May 15, 2008, the Plaintiff, Thelma Felipe, will move this court at the United States Courthouse, Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312 on the 25th day of June 2008, at 9:30 a.m. for an order:

- a) Remanding this matter to The Supreme Court of the State of New York, County of Bronx, pursuant to 28 U.S.C. 1332;
- b) for such other and further relief as this court deems just and proper.

Dated: New York, New York May 22, 2008

s/Michael Asta

MICHAEL J. ASTA (MJA 1035) LAW OFFICES OF MICHAEL J. ASTA Attorneys for Defendants Roman and DeJesus 450 SEVENTH AVE., SUITE 2205 NEW YORK, N.Y. 10001 (212) 244-6555

TO: SAL F. DELUCA, ESQ.
SIMMONS, JANNACE & STAGG, LLP
75 JACKSON AVENUE
SYOSSET, NY 11791